

**BROWN RUDNICK LLP**

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*Counsel to the Fair Deal Group*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
GENESIS GLOBAL HOLDCO, LLC, et al.,	:	Case No. 23-10063 (SHL)
	:	
Debtors <sup>1</sup> .	:	(Jointly Administered)
	:	
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**VERIFIED STATEMENT OF FAIR DEAL GROUP  
PURSUANT TO BANKRUPTCY RULE 2019**

Brown Rudnick LLP (“Brown Rudnick” or “Counsel”) hereby submits this verified statement (the “Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with Counsel’s representation of that certain ad hoc group

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<sup>1</sup> The Genesis Debtors in the Genesis Bankruptcy Proceedings along with the last four digits of each Genesis Debtor’s tax identification number as applicable, are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of the Genesis Bankruptcy Proceedings, the service address for the Genesis Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

of unsecured claimants (the “Fair Deal Group”) of the above-captioned affiliated debtors and debtors-in-possession (collectively, the “Debtors”), and in support thereof states as follows:

1. On July 21, 2023, the Fair Deal Group retained Brown Rudnick to represent it in connection with the above-captioned bankruptcy case.

2. As of the date of this Statement, Counsel represents only the Fair Deal Group and does not represent, or purport to represent, any other entity in connection with the Debtors’ Chapter 11 cases. Counsel does not represent the Fair Deal Group as a “committee” (as such term is employed in the Bankruptcy Code and the Bankruptcy Rules) and does not undertake to represent the interests of, and is not a fiduciary for, any creditor, party in interest, or entity other than the Fair Deal Group. In addition, the Fair Deal Group does not represent or purport to represent any other entities in connection with the Debtors’ Chapter 11 cases.

3. Each member of the Fair Deal Group beneficially holds one or more unsecured claims against the Debtors.

4. In accordance with Bankruptcy Rule 2019 and based upon information provided to Counsel by each member of Fair Deal Group, attached hereto as **Exhibit A** is a list of the members names, nature of economic interest, and amount of disclosable economic interests in relation to the Debtors of each of the members that presently comprise the Fair Deal Group.

5. Upon information and belief formed after due inquiry, Counsel does not hold any claim against, or interests in, the Debtors or their estates, other than claims for fees and expenses incurred in representing the Fair Deal Group.

6. Counsel submits this Statement out of an abundance of caution, and nothing herein should be construed as an admission that the requirements of Bankruptcy Rule 2019 apply to Counsel’s representation of the Fair Deal Group.

7. Nothing contained in this Statement (or the exhibit hereto) should be construed as (i) a limitation upon, or waiver of, any rights of any member or affiliate of any member of the Fair Deal Group to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases, or (ii) an admission with respect to any fact or legal theory.

*[Remainder of page intentionally left blank.]*

8. Counsel reserves the right to amend this Statement as necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

Dated: August 31, 2023  
New York, New York

Respectfully submitted,

**BROWN RUDNICK LLP**

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*Counsel to the Fair Deal Group*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2023, a true and correct copy of the foregoing document was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

/s/ *Kenneth J. Aulet*

Kenneth J. Aulet

**EXHIBIT A**

Name	Nature and Amount of Economic Interest <sup>1</sup>
Lender 1	BTC: \$318 million ETH: \$244 million USD: \$375 million Other: \$185 million
Lender 2	BTC: \$2 million ETH: \$2 million USD: \$14 million Other: \$2 million
Lender 3	BTC: \$76 million ETH: \$16 million USD: \$44 million Other: \$8 million
Lender 4	USD: \$55 million
Lender 5	BTC: \$1 million ETH: \$15 million USD: \$8 million Other: \$1 million
Lender 6	USD: \$4 million
Lender 7	BTC: \$75 million
Lender 8	BTC: \$16 million USD: \$4 million
Lender 9	BTC: \$34 million USD: \$1 million
Lender 10	BTC: \$17 million

<sup>1</sup> Amounts valued as of the petition date, rounded to the nearest million, accurate to the best of Brown Rudnick's knowledge as of August 30, 2023. USD amounts include both amounts denominated in USD and amounts denominated in USD-based stablecoins.

Name	Nature and Amount of Economic Interest <sup>1</sup>
Lender 11	BTC: \$5 million
Lender 12	ETH: \$2 million
Lender 13	BTC: \$21 million USD: \$12 million